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United States of America

IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

SHARON VANCE,

Defendant.

CASE NO. 5:24-MJ-00007-CDB
STIPULATION TO CONTINUE PRELIMINARY
HEARING AND EXCLUDE TIME

The parties stipulate as follows:

1. The defendant was arrested on a complaint in this case on February 22, 2024, in the Central District of California and made her initial appearance there the same day. The defendant's initial appearance and preliminary hearing in this District is scheduled for March 7, 2024.
2. The government is in the process of producing initial discovery to defense counsel. The initial discovery includes hundreds of thousands of pages of financial records, multiple electronic devices, and recordings.
3. The parties now agree to continue the initial appearance and preliminary hearing in this District until May 23, 2024. The parties also agree that good cause exists for the continuance because the extension is required to allow defense counsel reasonable time to complete his review of the

discovery, prepare for any litigation, and consider a pre-indictment resolution of the case.

4. The parties agree that the interests of justice served by granting this continuance outweigh the best interests of the public and the defendant in a speedy trial. The parties also agree that the period from February 28, 2024, through May 23, 2024, should be excluded. Fed. R. Crim. P. 5.1(d); 18 U.S.C. § 3161(h)(7)(A) and (h)(7)(B)(iv).

IT IS SO STIPULATED.

Dated: February 29, 2024

PHILLIP A. TALBERT
United States Attorney

/s/ Joseph Barton

Joseph Barton
Jeffrey Spivak
Assistant United States Attorneys

Dated: February 29, 2024

/s/ Victor Nasser

Victor Nasser
Counsel for Sharon Vance

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ORDER CONTINUING PRELIMINARY
HEARING AND EXCLUDING TIME

The Court has read and considered the parties' stipulation to continue the defendant's initial appearance and preliminary hearing in this District, and to exclude time. The Court finds there is good cause for the continuance so as to allow defense counsel reasonable time to complete his review of the discovery, prepare for any litigation, and consider a pre-indictment resolution of the case. The Court also finds that the interests of justice served by granting the continuance outweigh the interests of the public and the defendant in a speedy trial.

Therefore, for good cause shown:

1. The defendant's initial appearance and preliminary hearing in this District is continued from March 7, 2024, until May 23, 2024, at 2:00 p.m., and the defendant shall appear at that time before the Fresno duty magistrate judge; and

2. The period from February 28, 2024, through May 23, 2024, shall be excluded pursuant to Fed. R. Crim. P. 5.1(d) and 18 U.S.C. § 3161(h)(7)(A) and (h)(7)(B)(iv).

3.

IT IS SO ORDERED.

Dated: 2/29/2024

Sheila K. Oberto

Honorable Sheila K. Oberto
United States Magistrate Judge